

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

)
) Chapter 11
)

) Case No. 22-11068 (JTD)
) (Jointly Administered)
)
)

**ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS OF
FONDATION SERENDIPITY, FONDATION ELEMENTS, SERENDIPITY
NETWORK LTD AND LIQUIDITY NETWORK LTD**

PLEASE TAKE NOTICE that Reed Smith LLP (“Reed Smith”) hereby enters its appearance pursuant to section 1109(b) of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), on behalf of Fondation Serendipity, Fondation Elements, Serendipity Network Ltd. and Liquidity Network Ltd (collectively, the “**Foundations**”). Pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and 1109(b) of the Bankruptcy Code, Reed Smith requests that it be added to the service lists in the above-captioned chapter 11 bankruptcy cases (these “Cases”) and that copies of all notices, motions, pleadings and other papers filed or served in these Cases be served upon it at the following address:

Kurt F. Gwynne, Esquire
REED SMITH LLP
1201 North Market Street
Suite 1500
Wilmington, DE 19801-1163
Telephone: (302) 778-7500
Facsimile: (302) 778-7575
Email: kgwynne@reedsmith.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in Bankruptcy Rules 2002, 3017, 4001, 9007, and 9010(b), but also includes, without limitation, any plan of reorganization and objections thereto, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the aforementioned documents, and any other documents brought before this Court with respect to these Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Entry of Appearance* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a submission to the Bankruptcy Court's jurisdiction or a waiver of Foundations' rights (i) to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (ii) to trial by jury in any proceeding so triable in these Cases or any case, controversy, or proceeding related to these Cases; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) to any other rights, claims, actions, setoffs, or recoupments to which Foundations are or may be entitled under any agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

[continued on following page]

Dated: January 11, 2024
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By: Kurt F. Gwynne
Kurt F. Gwynne (No. 3951)
REED SMITH LLP
1201 N. Market Street, Suite 1500
Wilmington, DE 19801
Telephone: 302.778.7500
Facsimile: 302.778.7575
E-mail: kgwynne@reedsmith.com

-and-

REED SMITH LLP
Aaron Javian, Esq. (admission *pro hac vice*
pending)
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 521-5400
Facsimile: (212) 521-5450
E-mail: ajavian@reedsmith.com

Counsel to the Foundations